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January 23, 2025

VIA ECF

Honorable Jeanette A. Vargas
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

Re: Graham v. UMG Recordings, Inc., 1:25-cv-399 (JAV)

Dear Judge Vargas:

Plaintiff Aubrey Drake Graham (“Plaintiff”) respectfully writes regarding the Court’s order endorsing Defendant UMG Recordings, Inc.’s (“Defendant”) requested extension of time to respond to Plaintiff’s complaint from February 11, 2025 until March 17, 2025. *See* ECF No. 9. While Plaintiff attempted to reach agreement with Defendant on a full briefing schedule before Defendant filed its extension request (on the assumption that Defendant will move to dismiss Plaintiff’s complaint), Plaintiff writes now with a proposed extended briefing schedule for Plaintiff’s opposition and Defendant’s reply. Although Defendant’s position is that it is not necessary to set a complete briefing schedule at this time, Defendant consents to the proposed schedule.

Plaintiff respectfully submits that the below extended schedule would be appropriate given the length of the complaint, the complexity of the issues, and the fact that the parties have already agreed to, and the Court has ordered, an extension of Defendant’s time to respond. Specifically, as outlined below, Plaintiff requests a 14-day extension for his time to oppose a motion to dismiss and consents to a 7-day extension for Defendant’s time to file a reply in support of its motion to dismiss.

	Deadline per Federal Rules	Requested Deadline	Length of Extension
Opposition to Motion to Dismiss	March 31, 2025	April 16, 2025	14 days
Reply in support of Motion to Dismiss	April 23, 2025	April 30, 2025	7 days

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This is Plaintiff's first request for an extension of time to oppose Defendant's anticipated motion to dismiss and the first request for an extension of time for Defendant to file a reply in support of any such motion to dismiss.

The parties are scheduled to appear before this Court on April 2, 2025 at 12:00 p.m. for the initial pretrial conference. ECF No. 8.

Respectfully submitted,

s/ Michael J. Gottlieb

cc: All counsel of record via ECF